

FILED

Attachment 2 - EEOC Complaint Form

21 DEC -7 PM 4:24

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
Austin DIVISION

CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [Signature]  
DEPUTY CLERK

BRIAN COLLISTER

(Name of plaintiff or plaintiffs)

Civil Action Number **1:21CV1112 LY**

v.

TEGNA INC, WFAA TV,

CAROLYN MUNGO AND ELLEN CROOKE

(Supplied  
by Clerk's Office)

(Name of defendant or defendants)

**COMPLAINT**

1. This action is brought by Brian Collister, Plaintiff,  
pursuant to the following selected jurisdiction:

**(Please select the applicable jurisdiction)**

- ☒ Title VII of the Civil Rights Act of 1964 (42 USC §§ 2000e et seq.) Employment  
Discrimination on the basis of race, color, sex (gender, pregnancy and sexual harassment),  
religion or national origin.
- ☐ The Age Discrimination in Employment Act (29 USC §§ 621 et seq.) (ADEA).
- ☐ The Americans With Disabilities Act (42 USC §§ 12102 et seq.) (ADA).
- ☐ The Equal Pay Act (29 USC § 206(d)) (EPA).
- ☐ The Rehabilitation Act of 1973 (29 USC § 791 et seq.) (Applicable to federal employees  
only).

2. Defendant Brian Collister (Defendant's name) lives  
at, or its business is located at 295 Desert Willow Way  
(street address), Austin (city), TX  
(state), 78737 (zip).

- 3a. Plaintiff sought employment from the defendant or was employed by the defendant at TEGNA INC /WFAA TV 606 Young St (street address), (city), Dallas (state), TX 75202 (zip).
- 3b. At all relevant times of claim of discrimination, Defendant employed in excess of 100 (#) employees. If defendant is a union, at all relevant times of claim of discrimination, Defendant had \_\_\_\_\_ (#) members.
4. Defendant discriminated against plaintiff in the manner indicated in paragraph 8 of this complaint on or about February (month) 13 (day) 2020 (year). If incidents of discrimination occurred more than one day, please indicate the beginning and ending dates of such acts: 2/13/2020 TO DATE (CONTINUING ACTION)
5. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission (E.E.O.C.) charging defendant with the acts of discrimination indicated in paragraph 7 of this complaint on or about March (month) 25th (day) 2021 (year). (Not applicable to federal civil service employees).
- 6a. The E.E.O.C. issued a **Notice of Right to Sue** which was received by plaintiff on (month) September 8th (day) 2021 (year). (Not applicable to ADEA and EPA claims or federal civil service employees).

**VERY IMPORTANT NOTE:** PLEASE ATTACH A COPY OF YOUR NOTICE OF RIGHT TO SUE AND THE ENVELOPE IN WHICH IT WAS RECEIVED TO THIS COMPLAINT.

- 6b. Please indicate below if the E.E.O.C issued a **Determination** in your case:

☐ Yes  
☒ No

**VERY IMPORTANT NOTE:** IF YOU CHECKED "YES", PLEASE ATTACH A COPY OF THE E.E.O.C.'S DETERMINATION TO THIS COMPLAINT

7. Because of plaintiff's:

(Please select the applicable allegation(s))

- ☐ Race (If applicable, state race) \_\_\_\_\_
- ☐ Color (If applicable, state color) \_\_\_\_\_

- ☐ Sex (gender, pregnancy or sexual harassment) (If applicable, state sex and claim)
- ☐ Religion (If applicable, state religion) \_\_\_\_\_
- ☐ National Origin (If applicable, state national origin) \_\_\_\_\_
- ☒ Age (If applicable, state date of birth) 5/27/66
- ☐ Disability (If applicable, state disability) \_\_\_\_\_
- ☒ Prior complaint of discrimination or opposition to acts of discrimination.  
(Retaliation) (If applicable, explain events of retaliation) Refusal to hire because of EEOC complaint

The defendant: **(please select all that apply)**

- ☒ failed to employ plaintiff.
- ☐ terminated plaintiff's employment.
- ☐ failed to promote plaintiff.
- ☐ harassed plaintiff.
- ☐ other (specify) \_\_\_\_\_

8a. State **specifically** the circumstances under which defendant, its agent, or employees discriminated against plaintiff **PERSONALLY**:

**VERY IMPORTANT NOTE:** INCLUDE SPECIFIC DATES, SPECIFIC EVENTS,  
AND ANY SPECIFIC COMMENTS MADE BY  
DEFENDANT PERTAINING TO THE  
DISCRIMINATION CLAIM ALLEGED ABOVE.

I applied for the position of "TEGNA Texas Investigative / Deep Dive Multi-skilled Journalist" and was informed on 2/13/2020 they hired for the position. I was never contacted or interviewed. Younger and less experienced hired.

8b. List any **witnesses** who would testify for plaintiff to support plaintiff's allegations and the substance of their testimony:

Joe Ellis, Mark Smith, Jeremy Rogalski and James Keith

8c. List any **documentation** that would support plaintiff's allegations and explain what the documents will prove:

Plaintiff's job application and resume, resume of hired with less experience, email to hiring authority stating will work for whatever amount is budgeted and I meet stated qualifications for position.

9. The above acts or omissions set forth in paragraphs 7 and 8 are:

- ☒ still being committed by defendant.  
☐ no longer being committed by defendant.

10. Plaintiff should attach to this complaint a copy of the charge filed with the Equal Employment Opportunity Commission. This charge is submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, plaintiff prays that the Court grant the following relief to the plaintiff:

☒ Defendant be directed to employ plaintiff.

☐ Defendant be directed to re-employ plaintiff.

☐ Defendant be directed to promote plaintiff.

☒ Defendant be directed to pay damages  
and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

11/23/2021

Date

*Brian Collister*

Signature of Plaintiff

295 Desert Willow Way

Address of Plaintiff

Austin

TX

78737

City

State

Zip Code

Telephone Number(s) 512-808-8217

Attachment 11 - Certificate of Service

CERTIFICATE OF SERVICE

I, BRIAN COLLISTER, Plaintiff pro se,  
do here by certify that on the 23rd Day of November, 2021, a  
true and correct copy of the foregoing pleading was forwarded to  
, the attorney for (Defendant) by EMAIL (State the manner of delivery - eg. U.S. Mail; Hand  
Delivery; Certified Mail) at the following address: (give address of Attorney for the  
Defendant). Delivery to tfair@tegna.com

Brian Collister

295 Desert Willow Way  
Austin TX 78737

briancollister@yahoo.com

Dated: 11/23/21

Brian Collister

Signature of Plaintiff

